

**UNITED STATES DISTRICT
COURT NORTHERN DISTRICT
OF OHIO EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This document relates to:

Michelle Frost, et al. v. Endo Health Solutions Inc. et al.
Case No. 1:18-OP-46327

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

**DECLARATION OF EMILY ULLMAN IN SUPPORT OF DEFENDANTS'¹ MOTION
TO FILE UNDER SEAL OPPOSITION TO ASHLEY RACHEL DAWN POE'S MOTION
TO INTERVENE AS PLAINTIFF AND CLASS REPRESENTATIVE AND
ACCOMPANYING EXHIBITS**

I, Emily Ullman, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am an attorney at the law firm of Covington & Burling LLP, counsel for Defendant McKesson Corporation. I am a member in good standing of the bars of the State of New York and the District of Columbia. I have personal knowledge of the facts set forth in this Declaration, which I make to place before the Court documents and information relevant to its determination of Defendants' Motion to File under Seal Opposition to Ashley Rachel Dawn Poe's Motion to Intervene as Plaintiff and Class Representative and Accompanying Exhibits.
2. Attached hereto as Exhibit A is a true and accurate copy of an email thread culminating in a email from David Cohen to Emily Ullman and Marc Dann dated March 3, 2020.

¹ Several defendants named in this litigation are not subject to personal jurisdiction in this matter. This opposition is filed subject to and without waiving all defenses, including but not limited to lack of personal jurisdiction, failure of service of process, and ineffective service of process.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

/s/ Emily Ullman
Emily Ullman